UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

| DIRECT REPORT CORPORATION d/b/a SHAREHOLDER.COM, |))) |
|--|---------------------------------|
| Plaintiff, |)) |
| v. |) Civil Action No. 04-10535-PBS |
| CCBN.COM, INC., THE THOMSON CORPORATION, ROBERT I. ADLER, JOHN DOES 1 THROUGH 5, AND JANE DOES 1 THROUGH 5, |)))) |
| Defendants. |))) |

AFFIDAVIT OF RICHARD C. ABATI

- I, Richard C. Abati, on oath, depose and say as follows:
- 1. I am an attorney with the law firm of Choate, Hall & Stewart. Choate, Hall & Stewart represents Shareholder.com ("Shareholder") in this matter. I make this affidavit for the purpose of authenticating relevant documents which are cited in Shareholder's Motion To Compel Defendant The Thomson Corporation To Provide Rule 30(b)(6) Testimony Regarding Certain Subject Matters.
- 2. Attached hereto as **Exhibit A** is a true and correct copy of Shareholder's Notice of Rule 30(b)(6) Deposition dated September 23, 2005.
- 3. Attached hereto as **Exhibit B** is a true and correct copy of Jennifer Chunias' October 14, 2005 letter to Carlos Perez-Albuerne.
- 4. Attached hereto as **Exhibit C** is a true and correct copy Robert S. Frank, Jr.'s October 27, 2005 letter to Jennifer Chunias.

Signed under the penalties of perjury this 21st day of December, 2005.

/s/ Richard C. Abati

Richard C. Abati (BBO No. 651037)